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UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

Holding a Criminal Term

Grand Jury Sworn in on January 8, 2021

UNITED STATES OF AMERICA	:	**CRIMINAL NO. 21-cr-28-APM**
	:	
v.	:	**MAGISTRATE NOS.**
	:	**21-mj-228, 21-mj-225**
THOMAS CALDWELL,	:	
(Counts 1, 2, 3, 4, 5)	:	**VIOLATIONS:**
	:	**18 U.S.C. § 371 (Conspiracy)**
DONOVAN CROWL,	:	
(Counts 1, 2, 3, 4)	:	**18 U.S.C. §§ 1512(c)(2), 2**
	:	**(Obstruction of an Official Proceeding and**
JESSICA WATKINS,	:	**Aiding and Abetting)**
(Counts 1, 2, 3, 4)	:	
	:	**18 U.S.C. §§ 1361, 2**
SANDRA PARKER,	:	**(Destruction of Government Property and**
(Counts 1, 2, 3, 4)	:	**Aiding and Abetting)**
	:	
BENNIE PARKER,	:	**18 U.S.C. § 1752(a)(1)**
(Counts 1, 2, 3, 4)	:	**(Entering and Remaining in a Restricted**
	:	**Building or Grounds)**
GRAYDON YOUNG,	:	
(Counts 1, 2, 3, 4, 6)	:	**18 U.S.C. § 1512(c)(1)**
	:	**(Tampering with Documents or**
LAURA STEELE,	:	**Proceedings)**
(Counts 1, 2, 3, 4)	:	
	:	
KELLY MEGGS, and	:	
(Counts 1, 2, 3, 4)	:	
	:	
CONNIE MEGGS,	:	
(Counts 1, 2, 3, 4)	:	
	:	
Defendants.	:	
	:	

FIRST SUPERSEDING INDICTMENT

The Grand Jury charges that, at all times material to this Indictment, on or about the dates stated below:

Introduction

The 2020 United States Presidential Election and the Official Proceeding on January 6, 2021

1. The 2020 United States Presidential Election occurred on November 3, 2020.

2. The United States Electoral College ("Electoral College") is a group required by the Constitution to form every four years for the sole purpose of electing the president and vice president, with each state appointing its own electors in a number equal to the size of that state's Congressional delegation.

3. On December 14, 2020, the presidential electors of the Electoral College met in the state capital of each state and in the District of Columbia and formalized the result of the 2020 U.S. Presidential Election: Joseph R. Biden Jr. and Kamala D. Harris were declared to have won sufficient votes to be elected the next president and vice president of the United States.

4. On January 6, 2021, a Joint Session of the United States House of Representatives and the United States Senate ("the Joint Session") convened in the United States Capitol ("the Capitol") building to certify the vote of the Electoral College of the 2020 U.S. Presidential Election ("the Electoral College vote").

The Attack at the U.S. Capitol on January 6, 2021

5. The Capitol is secured 24 hours a day by United States Capitol Police ("Capitol Police"). The Capitol Police maintain permanent and temporary barriers to restrict access to the Capitol exterior, and only authorized individuals with appropriate identification are allowed inside the Capitol building.

6. On January 6, 2021, at approximately 1:00 p.m., the Joint Session convened in the Capitol building to certify the Electoral College vote. Vice President Michael R. Pence, in his constitutional duty as President of the Senate, presided over the Joint Session.

7. A large crowd began to gather outside the Capitol perimeter as the Joint Session got underway. Crowd members eventually forced their way through, up, and over Capitol Police barricades and advanced to the building's exterior façade. Capitol Police officers attempted to maintain order and stop the crowd from entering the Capitol building, to which the doors and windows were locked or otherwise secured. Nonetheless, shortly after 2:00 p.m., crowd members forced entry into the Capitol building by breaking windows, ramming open doors, and assaulting Capitol Police officers. Other crowd members encouraged and otherwise assisted the forced entry. The crowd was not lawfully authorized to enter or remain inside the Capitol, and no crowd member submitted to security screenings or weapons checks by Capitol Police or other security officials.

8. Shortly thereafter, at approximately 2:20 p.m., members of the House and Senate (including Vice President Pence)—who had withdrawn to separate chambers to resolve an objection—were evacuated from their respective chambers. The Joint Session was halted while Capitol Police and other law-enforcement officers worked to restore order and clear the Capitol of the unlawful occupants.

9. Later that night, law enforcement regained control of the Capitol. At approximately 8:00 p.m., the Joint Session reconvened, presided over by Vice President Pence, who had remained hidden within the Capitol building throughout these events.

10. In the course of these events, approximately 81 members of the Capitol Police and 58 members of the Metropolitan Police Department were assaulted. The Capitol suffered millions of dollars in damage—including broken windows and doors, graffiti, and residue from pepper

spray, tear gas, and fire extinguishers deployed both by crowd members who stormed the Capitol and by Capitol Police officers trying to restore order. Additionally, many media members were assaulted and had cameras and other news-gathering equipment destroyed.

The Oath Keepers Militia

11. Law enforcement and news-media organizations observed that members of an organization known as the Oath Keepers were among the individuals and groups who forcibly entered the Capitol on January 6, 2021. The Oath Keepers are a large but loosely organized collection of individuals, some of whom are associated with militias. Some members of the Oath Keepers believe that the federal government has been coopted by a cabal of elites actively trying to strip American citizens of their rights. Though the Oath Keepers will accept anyone as members, they explicitly focus on recruiting current and former military, law enforcement, and first-responder personnel. The organization's name alludes to the oath sworn by members of the military and police to defend the Constitution "from all enemies, foreign and domestic." The Oath Keepers are led by PERSON ONE.

12. On January 4, 2021, PERSON ONE posted an article to the Oath Keepers website encouraging Oath Keeper members and affiliates to go to Washington, D.C., for the events of January 5-6, 2021, stating: "It is CRITICAL that all patriots who can be in DC get to DC to stand tall in support of President Trump's fight to defeat the enemies foreign and domestic who are attempting a coup, through the massive vote fraud and related attacks on our Republic. We Oath Keepers are both honor-bound and eager to be there in strength to do our part."

Conspirators

13. THOMAS CALDWELL is a 65-year-old resident of Clarke County, Virginia.

14. DONOVAN CROWL is a 50-year-old resident of Champaign County, Ohio.

15. JESSICA WATKINS is a 38-year-old resident of Champaign County, Ohio.

16. SANDRA PARKER is a 60-year-old resident of Warren County, Ohio, and the wife of BENNIE PARKER.

17. BENNIE PARKER is a 70-year-old resident of Warren County, Ohio, and the husband of SANDRA PARKER.

18. GRAYDON YOUNG is a 54-year-old resident of Englewood, Florida, and the brother of LAURA STEELE.

19. LAURA STEELE is a 52-year-old resident of Thomasville, North Carolina, and the sister of GRAYDON YOUNG.

20. KELLY MEGGS is a 52-year-old resident of Dunnellon, Florida, and the husband of CONNIE MEGGS.

21. CONNIE MEGGS is a 59-year-old resident of Dunnellon, Florida, and the wife of KELLY MEGGS.

22. As described more fully herein, CALDWELL, CROWL, WATKINS, SANDRA PARKER, BENNIE PARKER, YOUNG, STEELE, KELLY MEGGS, and CONNIE MEGGS, planned with each other, and with others known and unknown, to forcibly enter the Capitol on January 6, 2021, and to stop, delay, and hinder the Congressional proceeding occurring that day.

COUNT ONE
(Conspiracy—18 U.S.C. § 371)

23. The introductory allegations set forth in paragraphs 1 through 22 are re-alleged and incorporated by reference as though set forth herein.

The Conspiracy

24. From at least as early as November 3, 2020, through January 6, 2021, in the District of Columbia and elsewhere, the defendants,

THOMAS CALDWELL,
DONOVAN CROWL,
JESSICA WATKINS,
SANDRA PARKER,
BENNIE PARKER,
GRAYDON YOUNG,
LAURA STEELE,
KELLY MEGGS, and
CONNIE MEGGS,

did knowingly combine, conspire, confederate, and agree with each other and others known and unknown, to commit an offense against the United States, namely, to corruptly obstruct, influence, and impede an official proceeding, that is, Congress's certification of the Electoral College vote, and to attempt to do so, in violation of Title 18, United States Code, Section 1512(c)(2).

Purpose of the Conspiracy

25. The purpose of the conspiracy was to stop, delay, and hinder Congress's certification of the Electoral College vote.

Manner and Means

26. CALDWELL, CROWL, WATKINS, SANDRA PARKER, BENNIE PARKER, YOUNG, STEELE, KELLY MEGGS, and CONNIE MEGGS, with others known and unknown, carried out the conspiracy through the following manner and means, among others, by:

a. Agreeing to participate in and taking steps to plan an operation to interfere with the official Congressional proceeding to certify the vote of the Electoral College of the 2020 U.S. Presidential Election on January 6, 2021 (the "January 6 operation");

b. Attending or scheduling trainings to teach and learn paramilitary combat tactics in advance of the January 6 operation;

c. Using websites, social media, text messaging, and messaging applications to recruit other individuals to travel to Washington, D.C., to support the January 6 operation;

d. Coordinating in advance with others, including members of the Oath Keepers from other regions, and joining forces with these individuals and groups to further the January 6 operation;

e. Traveling to Washington, D.C., for the January 6 operation;

f. Bringing and contributing paramilitary gear and supplies—including camouflaged combat uniforms, tactical vests with plates, helmets, eye protection, and radio equipment—for the January 6 operation;

g. Traveling into Washington, D.C., on January 6, 2021, while wearing clothes with the Oath Keepers insignia;

h. Changing into paramilitary gear—including helmets—before participating in the January 6 operation;

i. Moving together in a military "stack" formation while utilizing hand signals to maintain communication and coordination while advancing toward the Capitol as part of the January 6 operation;

j. Forcibly storming past exterior barricades, Capitol Police, and other law enforcement officers, and entering the Capitol complex in executing the January 6 operation; and

k. Using a walkie-talkie-like application, and creating a channel on it named "Stop the Steal J6," to develop plans and later communicate during the January 6 operation.

Overt Acts

Planning for January 6, 2021

27. On November 9, 2020, WATKINS, the self-described "C.O. [Commanding Officer] of the Ohio State Regular Militia," sent text messages to a number of individuals who had expressed interest in joining the Ohio State Regular Militia. In these messages, WATKINS

mentioned, among other things, that the militia had a week-long "Basic Training class coming up in the beginning of January," and WATKINS told one recruit, "I need you fighting fit by innaugeration." WATKINS told another individual, "It's a military style basic, here in Ohio, with a Marine Drill Sergeant running it. An hour north of Columbus Ohio[.]"

28. On November 9, 2020, WATKINS asked a recruit if he could "download an App called Zello"[1] and stated, "We all use Zello though for operations."

29. On November 17, 2020, when a recruit asked WATKINS for her predictions for 2021, WATKINS replied, among other statements:

> I can't predict. I don't underestimate the resolve of the Deep State. Biden may still yet be our President. If he is, our way of life as we know it is over. Our Republic would be over. Then it is our duty as Americans to fight, kill and die for our rights.

and:

> [I]f Biden get the steal, none of us have a chance in my mind. We already have our neck in the noose. They just haven't kicked the chair yet.

30. On November 23, 2020, CALDWELL sent a text message to WATKINS stating:

> Hi, CAP! Wanted to tell you it was great to have you here in Virginia. Don't know what [PERSON ONE] is cooking up but I am hearing rumblings of another Maga March 12 December.[2] I don't know what will happen but like you I am very worried about the future of our country. Once lawyers get involved all of us normal people get screwed. I believe we will have to get violent to stop this, especially the antifa maggots who are sure to come out en masse even if we get the Prez for 4 more years. Stay sharp and we will meet again. You are my kinda person and we may have to fight next time. I have my own gear, I like to be ON TIME and go where the enemy is, especially after dark. Keep the faith! Spy.

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[1] Zello is an application that emulates push-to-talk walkie-talkies over cellular telephone networks. Zello can be used on electronic communication devices, like cellular telephones and two-way radios.

[2] An event colloquially referred to as the "Million MAGA March" occurred in Washington, D.C., on November 14, 2020. A similar event occurred in Washington, D.C., on December 12, 2020.

31. On December 3, 2020, YOUNG emailed the Florida chapter of the Oath Keepers with a membership application and wrote, "looking to get involved in helping...."

32. On December 12-13, 2020, CROWL attended a training camp in North Carolina.

33. On December 19, 2020, YOUNG wrote to a Facebook group: "Please check out Oath Keepers as a means to get more involved. Recruiting is under way. DM me if you want more info."

34. On December 22, 2020, YOUNG made plans to fly from Florida to North Carolina on January 4, 2021, with a return trip on January 8, 2021.

35. On December 22, 2020, KELLY MEGGS wrote a series of messages on Facebook to another individual that read in part:

a. "Trump said It's gonna be wild!!!!!!! It's gonna be wild!!!!!!! He wants us to make it WILD that's what he's saying. He called us all to the Capitol and wants us to make it wild!!! Sir Yes Sir!!! Gentlemen we are heading to DC pack your shit!!"

b. "Nice, we will have at least 50-100 OK[3] there."

36. On December 25, 2020, KELLY MEGGS wrote a message on Facebook that said in relevant part: "I was named State lead of Florida today."

37. On December 25, 2020, KELLY MEGGS wrote a message on Facebook that said in relevant part: "We are all staying in DC near the Capitol we are at the Hilton garden inn but I think it's full. Dc is no guns. So mace and gas masks, some batons. If you have armor that's good."

38. On December 26, 2020, YOUNG wrote an email to a Florida company that conducts training on firearms and combat. YOUNG wrote, in part, "I trained with you not long

[3] Based on the investigation, OK appears to refer to "Oath Keepers."

ago. Since then I have joined Oath Keepers. I recommended your training to the team. To that effect, four of us would like to train with you, specifically in your UTM[4] rifle class."

39. On December 26 and 27, 2020, WATKINS and BENNIE PARKER exchanged text messages relating to preparations for the trip to Washington, D.C., on January 6, 2021. BENNIE PARKER also texted WATKINS, "I may have to see what it takes to join your militia, ours is about gone."

40. On December 29, 2020, WATKINS sent text messages to CROWL sharing her plans to go to Washington, D.C., for the events of January 6, 2021.

41. On December 29 and 30, 2020, WATKINS and BENNIE PARKER exchanged text messages in which they discussed Oath Keeper membership and meeting in advance to prepare for the trip to Washington, D.C., on January 6, 2021.

42. On December 30, 2020, CALDWELL wrote in a Facebook post: "THIS IS OUR CALL TO ACTION, FREINDS! SEE YOU ON THE 6TH IN WASHINGTON, D.C. ALONG WITH 2 MILLION OTHER LIKE-MINDED PATRIOTS."

43. On December 30, 2020, WATKINS and CALDWELL exchanged the following text messages:

> WATKINS: Looks like we are greenlight to come to DC on the 6th. The Rally Point still at your place?
>
> CALDWELL: Not that I am aware. Have been contacted by NO ONE. Typical [PERSON ONE]. Here's the rub: [PERSON TWO] and I will be in a hotel within striking distance of the city starting on the 4th so we won't even BE here. There will be some stuff going on during the 5th and we want to be a part of that whenever it shakes out. Also we want to be in D.C. very early on the 6th, hence closer/virtually no commute time.

[4] Based on the investigation, UTM appears to refer to "Ultimate Training Munitions."

WATKINS: We planned on arriving on the 5th. We want to be in DC by 9am on the 6th. I will reach out to [PERSON THREE], and see if NC boys are coming. If [PERSON ONE] isn't making plans, I'll take charge myself, and get the ball rolling. I think the Metro is smarter than convoy/parking issues. Do you want us to stage ourselves vehicles elsewhere, seeing how you're going to be gone? We can go to a KOA Campground or something...

. . .

CALDWELL (about two hours later):

> Talked to [PERSON THREE]. At least one full bus 40+ people coming from N.C. Another group (unclear if Mississippi guys) also a bus. Busses have their own lane on the 14th street bridge so they will be able to get in and out. [PERSON THREE] is driving plus 1 and arriving nite before. As we speak he is trying to book a room at Comfort Inn Ballston/Arlington because of its close-in location and easy access to downtown because he feels 1) he's too broken down to be on the ground all day and 2) he is committed to being the quick reaction force anf bringing the tools if something goes to hell. That way the boys don't have to try to schlep weps on the bus. He'll bring them in his truck day before. Just got a text from him he WAS able to book a room in that hotel I recommended which is on Glebe Road in Arlington. However it goes it will be great to see you again! I sure hope your arm is getting better!

44. On December 31, 2020, CALDWELL replied to a Facebook comment, writing, "It begins for real Jan 5 and 6 on Washington D.C. when we mobilize in the streets. Let them try to certify some crud on capitol hill with a million or more patriots in the streets. This kettle is set to boil…"

45. On December 31, 2020, when invited to a "leadership only" conference call on an encrypted messaging service called Signal for the "DC op," WATKINS said she would try to make it if her work obligations permitted.

46. On December 31, 2020, KELLY MEGGS wrote a series of messages to another person on Facebook that said, "You guys Gonna carry?" and "Ok we aren't either, we have a heavy QRF[5] 10 Min out though."

47. On January 1, 2021, CALDWELL replied to a Facebook comment, writing, "I accept that assignment! I swore to support and defend the Constitution of the United States against all enemies foreign and domestic. I did the former, I have done the latter peacefully but they have morphed into pure evil even blatantly rigging an election and paying off the political caste. We must smite them now and drive them down."

48. On January 1, 2021, CROWL sent CALDWELL a Facebook message stating, "Happy New year, to you Sir!! Guess I'll be seeing you soon. Will probably call you tomorrow…mainly because…I like to know wtf plan is. You are the man Commander."

49. On January 1, 2021, CALDWELL wrote to CROWL, "Check with Cap. I recommended the following hotel to her which STILL has rooms (unbelieveble)." CALDWELL then sent a link to the Comfort Inn Ballston, the same hotel that he recommended to others on January 1. CALDWELL continued, "[PERSON TWO] and I are setting up shop there. [PERSON THREE] has a room and is bringing someone. He will be the quick reaction force. Its going to be cold. We need a place to spend the night before minimum. [PERSON ONE] never contacted me so [PERSON TWO] and I are going our way. I will probably do pre-strike on the 5th though there are things going on that day. Maybe can do some night hunting. Oathkeeper friends from North Carolina are taking commercial buses up early in the morning on the 6th and back same night. [PERSON THREE] will have the goodies in case things go bad and we need to get heavy."

[5] Based on the investigation, QRF appears to refer to a "quick reaction force," as used in paragraph 43.

50. On January 1, 2021, CROWL and WATKINS made plans to travel by car to Washington, D.C., to attend the events of January 5-6, 2021.

51. Beginning on January 1, and continuing into January 2, 2021, CALDWELL and CROWL exchanged messages about the hotel where they planned to stay in Arlington, Virginia, and CALDWELL told CROWL: "This is a good location and would allow us to hunt at night if we wanted to. I don't know if [PERSON ONE] has even gotten out his call to arms but its a little friggin late. This is one we are doing on our own. We will link up with the north carolina crew."

52. On January 3, 2021, STEELE emailed the Florida chapter of the Oath Keepers with a membership application and wrote, "My brother, Graydon Young told me to submit my application this route to expedite the process." Later in the day, STEELE emailed KELLY MEGGS and wrote, "My brother, Graydon Young told me to send the application to you so I can be verified for the Events this coming Tuesday and Wednesday." The following day, STEELE sent an email to an Oath Keepers address, copying both YOUNG and KELLY MEGGS, attaching her Florida Oath Keepers membership application and vetting form, and writing, "I was just requested to send my documents to this email."

53. On January 3, 2021, WATKINS sent CROWL a Facebook message stating, "Running a bit behind. I'll txt when I'm back at the bar. Getting supplies for DC."

54. On January 3, 2021, WATKINS and BENNIE PARKER discussed the uniforms, gear, and weapons they would wear and bring on January 6, 2021:

WATKINS to BENNIE PARKER:	We are not bringing firearms. QRF will be our Law Enforcement members of Oathkeepers.
BENNIE PARKER to WATKINS:	Good to know.

WATKINS to BENNIE PARKER:	Pack Khaki/Tan pants. Weapons are ok now as well. Sorry for the confusion. We are packing the car and heading your way shortly
BENNIE PARKER to WATKINS:	We don't have any khakis We have jeans and our b d u's[6] So I can bring my gun?

55. On January 4, 2021, YOUNG took a flight from Tampa, Florida, to Greensboro, North Carolina.

56. On January 4, 2021, CROWL, WATKINS, SANDRA PARKER, and BENNIE PARKER departed Ohio together and traveled to the Washington, D.C. metropolitan area.

57. On January 5, 2021, YOUNG and STEELE departed North Carolina with others known and unknown and traveled to the Washington, D.C., metropolitan area.

58. CALDWELL paid for a room for two people at the Comfort Inn Ballston from January 5-7, 2021.

59. WATKINS paid for a room for two people at the Comfort Inn Ballston—the hotel recommended by CALDWELL—from January 5-7, 2021, and reserved under the name "Jessica Wagkins."

60. SANDRA PARKER paid for a room for two people at the Comfort Inn Ballston from January 5-7, 2021.

61. KELLY MEGGS paid for two rooms, each for two people, at the Comfort Inn Ballston from January 5-6, 2021. The rooms were reserved under the name of PERSON THREE.

62. KELLY MEGGS also booked two rooms at the Hilton Garden Inn in Washington, D.C., from January 5-7, 2021. KELLY MEGGS paid for one of the rooms.

[6] Based on the investigation, "B.D.U." appears to be a military reference to the Battle Dress Uniform, which is a camouflaged combat uniform.

63. YOUNG paid for a room for two people at the Holiday Inn in Springfield, Virginia, from January 5-6, 2021.

Coordination and Participation in the January 6 Operation

64. On the morning of January 6, 2021, YOUNG and STEELE traveled together from Springfield, Virginia, to Washington, D.C.

65. On the morning of January 6, 2021, CROWL, WATKINS, CALDWELL, SANDRA PARKER, and BENNIE PARKER, traveled from Arlington, Virginia, to Washington, D.C.

66. On January 6, 2021, CROWL, WATKINS, SANDRA PARKER, BENNIE PARKER, YOUNG, STEELE, KELLLY MEGGS, and CONNIE MEGGS prepared themselves for battle before heading to the Capitol by equipping themselves with communication devices and donning reinforced vests, helmets, and goggles.

67. On January 6, 2021, at approximately 2:06 p.m., CALDWELL sent WATKINS a text message stating: "Where are you? Pence has punked out. We are screwed. Teargassing peaceful protesters at capital steps. Getting rowdy here... I am here at the dry fountain to the left of the Capitol[.]"

68. At the Capitol, CROWL, WATKINS, SANDRA PARKER, YOUNG, STEELE, KELLY MEGGS, and CONNIE MEGGS joined together with others known and unknown to form a stack of individuals wearing Oath Keepers clothing, patches, insignia, and battle gear. Together, the stack maneuvered in an organized and practiced fashion up the steps on the east side of the Capitol—each individual keeping at least one hand on the shoulder of the other in front of them.

69. At approximately 2:40 p.m., CROWL, WATKINS, SANDRA PARKER, YOUNG, STEELE, KELLY MEGGS, CONNIE MEGGS, and the others in their group forcibly entered the Capitol building.

70. As they entered the Capitol, CROWL, WATKINS, SANDRA PARKER, YOUNG, STEELE, KELLY MEGGS, CONNIE MEGGS, and the others in their group joined the larger crowd in pushing past at least one law enforcement officer who appeared to be trying to stop the crowd from breaching the Capitol building.

71. The Capitol building doors through which CROWL, WATKINS, SANDRA PARKER, YOUNG, STEELE, KELLY MEGGS, CONNIE MEGGS, and the others in their group breached suffered significant damage.

72. After they penetrated the Capitol building, CROWL, WATKINS, SANDRA PARKER, YOUNG, STEELE, KELLY MEGGS, CONNIE MEGGS, and the others in their group then collectively moved into an area inside the building known as the Capitol Rotunda.

73. As they navigated through the Capitol building, CROWL, WATKINS, SANDRA PARKER, YOUNG, STEELE, KELLY MEGGS, CONNIE MEGGS, and the others in their group continued to communicate with one another by keeping their hands on each other's backs.

74. While at the Capitol building on January 6, 2021, WATKINS and others known and unknown communicated and coordinated their actions on Zello, using a Zello channel named "Stop the Steal J6." WATKINS participated in the following exchanges, among others:

a. WATKINS stated, "We have a good group. We have about 30-40 of us. We are sticking together and sticking to the plan." An individual responded, "We'll see you soon, Jess. Airborne."

b. An individual directed, "You are executing citizen's arrest. Arrest this assembly, we have probable cause for acts of treason, election fraud." WATKINS responded, "We are in the mezzanine. We are in the main dome right now. We are rocking it. They are throwing grenades, they are fricking shooting people with paint balls. But we are in here." An individual responded to WATKINS, telling her to be safe, and stated, "Get it, Jess. Do your fucking thing. This is what we fucking [unintelligible] up for. Everything we fucking trained for."

75. Meanwhile, CALDWELL, who was positioned on the west side of the Capitol, joined with PERSON TWO and others known and unknown in storming past barricades and climbing stairs up to a balcony on the west side of the Capitol building.

76. At 2:48 p.m., CALDWELL sent a message on Facebook, writing, "We are surging forward. Doors breached[.]"

77. At 3:05 p.m., CALDWELL wrote in a Facebook message, "Inside."

(In violation of Title 18, United States Code, Section 371)

COUNT TWO
(18 U.S.C. §§ 1512(c)(2), 2—Obstruction of an Official Proceeding and Aiding and Abetting)

78. Paragraphs 1 through 22 and paragraphs 27 through 77 of this Indictment are re-alleged and incorporated as though set forth herein.

79. On or about January 6, 2021, in the District of Columbia and elsewhere, the defendants,

THOMAS CALDWELL,
DONOVAN CROWL,
JESSICA WATKINS,
SANDRA PARKER,
BENNIE PARKER,
GRAYDON YOUNG,
LAURA STEELE,
KELLY MEGGS, and
CONNIE MEGGS

attempted to, and did, corruptly obstruct, influence, and impede an official proceeding, and did aid and abet others known and unknown to do the same; that is, CALDWELL, CROWL, WATKINS, SANDRA PARKER, BENNIE PARKER, YOUNG, STEELE, KELLY MEGGS, and CONNIE MEGGS, forcibly entered the Capitol to, and did, stop, delay, and hinder Congress's certification of the Electoral College vote.

(In violation of Title 18, United States Code, Sections 1512(c)(2), 2)

COUNT THREE
(18 U.S.C. §§ 1361, 2—Destruction of Government Property and Aiding and Abetting)

80. Paragraphs 1 through 22 and paragraphs 27 through 77 of this Indictment are re-alleged and incorporated as though set forth herein.

81. On January 6, 2021, in the District of Columbia and elsewhere, the defendants,

THOMAS CALDWELL,
DONOVAN CROWL,
JESSICA WATKINS,
SANDRA PARKER,
BENNIE PARKER,
GRAYDON YOUNG,
LAURA STEELE,
KELLY MEGGS, and
CONNIE MEGGS

attempted to, and did, willfully injure and commit depredation against property of the United States, and did aid and abet others known and unknown to do so; that is, CALDWELL, CROWL, WATKINS, SANDRA PARKER, BENNIE PARKER, YOUNG, STEELE, KELLY MEGGS, and CONNIE MEGGS, together and with others known and unknown, forcibly entered the Capitol and thereby caused damage to the building in an amount more than $1,000.

(In violation of Title 18, United States Code, Sections 1361, 2)

COUNT FOUR
(18 U.S.C. § 1752(a)(1)—Restricted Building or Grounds)

82. Paragraphs 1 through 22 and paragraphs 27 through 77 of this Indictment are re-alleged and incorporated as though set forth herein.

83. On or about January 6, 2021, in the District of Columbia and elsewhere, the defendants,

THOMAS CALDWELL,
DONOVAN CROWL,
JESSICA WATKINS,
SANDRA PARKER,
BENNIE PARKER,
GRAYDON YOUNG,
LAURA STEELE,
KELLY MEGGS, and
CONNIE MEGGS

did unlawfully and knowingly enter and remain in a restricted building and grounds, and did knowingly, and with intent to impede and disrupt the orderly conduct of Government business and official functions, engage in disorderly and disruptive conduct in and within such proximity to, a restricted building and grounds; that is, CALDWELL, CROWL, WATKINS, SANDRA PARKER, BENNIE PARKER, YOUNG, STEELE, KELLY MEGGS, and CONNIE MEGGS entered and remained in the Capitol complex where the Vice President was temporarily visiting and where a special event of national significance was in progress.

(In violation of Title 18, United States Code, Section 1752(a)(1))

COUNT FIVE
(18 U.S.C. § 1512(c)(1)—Tampering with Documents or Proceedings)

84. Paragraphs 1 through 22 and paragraphs 27 through 77 of this Indictment are re-alleged and incorporated as though set forth herein.

85. On January 6, 2021, the Federal Bureau of Investigation ("FBI") opened an investigation into the attack on the Capitol, and a grand jury of the United States District Court for the District of Columbia subsequently opened an investigation.

86. On January 8, 2021, in response to a request from CROWL for a video, CALDWELL sent the video, and subsequently unsent the message containing the video.

87. Between January 6, 2021, and January 19, 2021, CALDWELL deleted photographs from his Facebook account that documented his participation in the attack on the Capitol on January 6, 2021.

88. Between January 6, 2021, and January 19, 2021, in the District of Columbia and elsewhere, the defendant, **THOMAS CALDWELL**, did corruptly alter, destroy, mutilate, and conceal a record, document, and other object, and attempted to do so, with the intent to impair its integrity and availability for use in an official proceeding, that is, the FBI investigation and the grand jury investigation into the attack on the Capitol on January 6, 2021.

(In violation of Title 18, United States Code, Section 1512(c)(1))

COUNT SIX
(18 U.S.C. § 1512(c)(1)—Tampering with Documents or Proceedings)

89. Paragraphs 1 through 22, paragraphs 27 through 77, and paragraph 85 of this Indictment are re-alleged and incorporated as though set forth herein.

90. On January 8, 2021, YOUNG deleted YOUNG's Facebook account.

91. On January 8, 2021, in the District of Columbia and elsewhere, the defendant, **GRAYDON YOUNG**, did corruptly alter, destroy, mutilate, and conceal a record, document, and other object, and attempted to do so, with the intent to impair its integrity and availability for use in an official proceeding, that is, the FBI investigation and the grand jury investigation into the attack on the Capitol on January 6, 2021.

(In violation of Title 18, United States Code, Section 1512(c)(1))

A TRUE BILL

FOREPERSON

Michael R. Sherwin /jc

MICHAEL R. SHERWIN
ACTING ATTORNEY FOR THE UNITED STATES
IN AND FOR THE DISTRICT OF COLUMBIA